

# Exhibit C

Gregory, Gene W. - Vol. I

July 15, 2013

1

IN THE DISTRICT COURT OF WYANDOTTE COUNTY, KANSAS  
TWENTY-NINTH JUDICIAL CIRCUIT

-----+  
ASSOCIATED WHOLESALE  
GROCERS, et al,

Plaintiffs,

vs.

UNITED EGG PRODUCERS,  
et al,

Defendants.  
-----+

Case No.: 10CV2171

Videotaped Deposition of Gene W. Gregory

Philadelphia, Pennsylvania

Monday, July 15, 2013

1:00 p.m.

(Volume 1)

Reported by: Laurie Bangart, RPR, CRR

Henderson Legal Services, Inc.

202-220-4158

www.hendersonlegalservices.com

1 Q Who is that?

2 A Her name is Karen Conrad.

3 Q How long has she maintained that?

4 A She's only been with us now about two  
5 years, but the position was always whoever the  
6 administrative assistant --

7 Q Okay.

8 A -- who is the secretary. We only have  
9 one of those people in our office. You got to  
10 understand, our office is only like eight people,  
11 so it's not like we got a whole big staff of  
12 people, so . . .

13 Q Sir, when you started in '92 with the  
14 UEP headquarters in Atlanta, who else was working  
15 in UEP at that time? Was there several people?

16 A There again, it was about eight people.  
17 It hasn't changed.

18 Q Okay, and who did you report to?

19 A Al Pope.

20 Q All right.

21 So one of your principal  
22 responsibilities that you recall, starting in '92,  
23 was to write the twice-monthly newsletter; is that  
24 correct?

25 A That's been the least enjoyable thing

1     **I'm responsible for, yes.**

2           Q     If you would just answer my question,  
3     because I want to make sure the record is clear  
4     that one of the things you started doing shortly  
5     after you joined in '92 was to write the  
6     newsletter that was sent out twice a month for  
7     UEP; is that right?

8           A     **Yes, yes.**

9           Q     Did you do that up until your retirement  
10    here in January of 2013?

11          A     **Yes.**

12          Q     All right.

13                Who has taken over the responsibilities  
14    to author United Voices now?

15          A     **Chad Gregory. He has the overall**  
16    **responsibility as being the editor of it, I**  
17    **suppose.**

18          Q     Okay.

19                Now, you've testified that when you  
20    started in 1982, there were five regions for UEP.

21                And is that because at that point in  
22    time, there were lots and lots of small egg  
23    farmers?

24          A     **Yeah. The egg industry has consolidated**  
25    **over the years, you know. There were several**